

Exhibit 18

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FILED 10 MAY 18 15:12 USDC-ORP

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ARKEMA INC., a Pennsylvania corporation,
et al.,

Plaintiffs,

vs.

A & C FOUNDRY PRODUCTS, INC., an
Oregon corporation, et al.,

Defendants.

No. 3:09-CV-453-PK

~~[PROPOSED]~~ ORDER OF STAY

The plaintiffs' Motion for Referral to Alternative Dispute Resolution (Docket #169)
came on for hearing on December 16, 2009 before the Honorable Magistrate Judge Paul Papak.

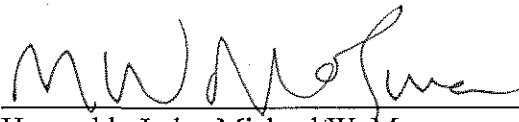
The Court having heard argument and being fully advised, hereby orders:

1. Proceedings in this action are stayed until one year from the date that EPA issues a Final Record of Decision for the Portland Harbor Federal Superfund Site, or until further order of this Court.
2. The defendants may, but are not required to, participate in the Portland Harbor alternative dispute resolution process described in the plaintiffs' Motion for Referral to Alternative Dispute Resolution (Docket. No. 169) (the Portland Harbor ADR).
3. The plaintiffs shall report to the Court and to defendants on the progress of the Portland Harbor ADR and on the status of the Portland Harbor Feasibility Study and Record of Decision at six month intervals commencing six months from the date of this Order.
4. During the stay, no new pleadings, motions or claims may be filed by any party, except as follows:
 - a. The plaintiffs will file a second amended complaint on or before January 15, 2010;
 - b. The defendants may move to dismiss the second amended complaint under FRCP 12(b)(6) on or before February 16, or advise the Court by that date that a previously filed motion to dismiss under FRCP 12(b)(6) applies to the second amended complaint; and
 - c. A defendant may request leave of court to file a third party claim against a person not currently a party to the case if necessary to avoid the application of the statute of limitations.
5. No discovery shall occur during the stay, except that
 - a. Parties, by agreement of the parties or by leave of the Court, may conduct depositions to preserve testimony that may no longer be available at the expiration of the stay. The plaintiffs shall make reasonable efforts to provide

notice of the deposition to all parties to the Portland Harbor ADR and to other parties with whom the plaintiffs have tolling agreements with respect to the Portland Harbor NPL Site; and

- b. Parties may issue subpoenas pursuant to FRCP 45(a)(1)(D) to non-parties to support the Portland Harbor ADR.
6. Nothing herein shall affect the ability of the United States to pursue in any way, whether administratively or judicially, or otherwise, any affirmative claim or remedy it might have under the Comprehensive Environmental Response Compensation and Liability Act, 42 U.S.C. §§9701 *et seq.*, or any other environmental statute, while acting in its sovereign capacity.

IT IS SO ORDERED this 18 day of ^{May}~~January~~, 2010.

By: 
Honorable Judge Michael W. Mosman
U.S. District Court Judge

Respectfully submitted December 30, 2009,

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